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*Attorneys for the Plaintiffs and the
Proposed Class Members*

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ANDREW CLARKE and TAPAS SARKAR,
individually and on behalf of other similarly
situated persons,

Plaintiffs,

v.

J.P. MORGAN CHASE & CO.,

Defendant.

08 Civ. 2400 (CM) (JCF)

**DECLARATION OF JACK A. RAISNER
IN SUPPORT OF MOTION FOR THE
APPOINTMENT OF OUTTEN &
GOLDEN, LIEFF CABRASER, AND
ALTSHULER BERZON AS CO-LEAD
INTERIM CLASS COUNSEL
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 23(G)**

I, JACK A. RAISNER, DECLARE:

1. I am a partner at OUTTEN & GOLDEN, LLP, counsel for plaintiffs in the above-captioned case. I make this statement of my own personal knowledge, and if called to testify, could and would testify competently thereto.
2. In preparation for this litigation, I interviewed the plaintiffs and fact witnesses, reviewed materials pertinent to the litigation, researched relevant case law and drafted the Complaint. My firm has already committed the time and efforts of two attorneys and numerous paralegals to the legal research, factual investigation, and prosecution of this lawsuit, and will continue to do so, keeping in mind appropriate staffing levels for each project.
3. Most of Outten & Golden's docketed wage and hour actions are filed in state and federal courts located within New York.
4. The firm frequently represents nation-wide classes of employees in Fair Labor Standards Act litigation, as well as state-wide class-actions filed under the New Jersey Wage and Hour Law ("NJWHL"), N.J.S.A. 34:11-56a et seq. and New York Labor Law ("NYLL") §§ 650 *et seq*
5. I have litigated numerous wage and hour class action lawsuits as a partner and/or Of Counsel of Outten & Golden, LLP, including *Dorfman, et al. v. United Parcel Service*, No. 06 CV 00703 (E.D.N.Y.); *Rosenburg, et al., v. IBM Corporation*, No. C06-0430 (PJH) (N.D. Cal.) (with Lieff Cabraser); *Hernandez, et al. v. The Home Depot Inc.*, No. CV-05 3433 (ERK) (SMG) (E.D.N.Y.); *Day, et al. v. Control Associates*, No. 04 CV-07125 (LAK)(THK(S.D.N.Y); *Clarke, et al. v. JP Morgan Chase & Co.* No. 04601519 (NY Sup. Ct., NY Cty) (customer service employees in New York); *Fouyolle v. JP Morgan Chase & Co.*, No. 04-2219 (S.D. Tex.) (call center workers in Texas); *Wilson Cole, et al. v. Global Financial Services of Nevada*, 05 Civ. 10011 (JGK)(S.D.N.Y); *Lamons, et al., v. Target Corporation*, CV 04-0260 (ILG) (SMG)

(E.D.N.Y.); *Westerfield et al. v. Washington Mutual Bank*, 06 Civ. 2817 (CBA)(JMA) (E.D.N.Y.) ; *Fei, et al. v. WestLB*, 07 Civ. 8785 (HB)(S.D.N.Y.); *Smith et al. v. Citigroup*, 07 Civ. 1791 (JG)(MRL)(E.D.N.Y.); *English et al. v. Ecolab, Inc.*, 06 Civ 5672 (PAC); *Boal et al. Premium Capital Funding LLC d/b/a Topdot Mortgage*, CV 07-698 (DRH) (ETB)(E.D.N.Y.)

6. I also frequently lecture about wage and hour litigation issues. For example in February of 2008, I lectured at the American Bar Association, Labor and Employment Law Section, Federal Labor Standards Legislation Committee's session on Ethical Issues in Wage & Hour Class Action Litigation. In October 2007 at a conference for the National Employment Lawyers Association I lectured about Ethical Issues in Representing Workers in Wage & Hour Actions. Additionally, in February 2007, I lectured for the American Bar Association, Labor and Employment Law Section, Federal Labor Standards Legislation Committee on the following topic: Ethical Issues: Ex Parte Contacts and Common Interest Doctrine.

7. I also write about wage and hour issues and class actions. I am a chapter contributor to *International Labor and Employment Laws* Vol. 1 ABA-BNA (Second Edition) and its annual Supplements, including the Subchapter on Wages, Hours, and Leave. I am also update editor of *Representing Plaintiffs in Title VII Actions* (2 vol.) Aspen, which includes several chapters on class action practice.

I declare under penalty of perjury under the laws of the United States that the forgoing is true and correct.

Dated: New York, New York
April 29, 2008

By: /s/ Jack A. Raisner

Jack A. Raisner